

1 Kresta Nora Daly, SBN 199689  
2 **BARTH DALY LLP**  
3 PO Box F  
4 Winters, CA 95694  
5 Telephone: (916) 440-8600  
6 Facsimile: (916) 440-9610  
7 Email: kdaly@barth-daly.com

8 Attorneys for Defendant  
9 **CHRISTIAN ROMERO**

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12  
13 Plaintiff,  
14  
15 v.  
16  
17 CHRISTIAN ROMERO,  
18  
19 Defendant.

Case No. 2:21-CR-00007-DAD-CKD

**UNOPPOSED MOTION TO  
RELEASE COLLATERAL AND  
ORDER**

19 Defendant Christian Romero by and through his counsel of record, requests  
20 this court order the properties posted as collateral in connection with his partly  
21 secured appearance bond be unencumbered and returned.

22 On November 12, 2021, Judge Delaney ordered Mr. Romero release on a  
23 \$150,000 partially secured appearance bond. The bond was partially secured by the  
24 following items:

25 Title to 2014 Chevrolet Corvette Stingray from Edward Romero [Dkt. 236];  
26 Title to 1995 Bay Linder Boat and 1995 boat trailer from Jairo Romero [Dkt.  
27 237];  
28 Title to 2001 Chevrolet Tahoe from Erika Romero [Dkt. 238];

1  
2 Title to 2013 Chevrolet Malibu from Erika Romero [Dkt. 239];  
3 Title to 2015 Hyundai Sonata from Carla Olivera [Dkt. 240];  
4 Title to 2017 Nissan from Olivera Ramirez Aroldo [Dkt. 241];  
5 \$35,000 cash [no docket number, docketed between entries 241 and 242];  
6 and  
7 Title to 2013 Dodge Charger from Edward Erubiel Romero [Dkt. 242].  
8

9 Mr. Romero was sentenced on July 16, 2024. He was ordered to turn himself  
10 in on September 23, 2024, which he did. As of the date of filing, BOP Inmate  
11 Locator indicates Mr. Romero is currently in custody at USP Atwater with a release  
12 date of May 24, 2032.

13 [https://www.bop.gov/mobile/find\\_inmate/byname.jsp#inmate\\_results](https://www.bop.gov/mobile/find_inmate/byname.jsp#inmate_results).

14 Mr. Romero's case is closed. There is no longer a need for collateral to  
15 secure his appearance bond. Mr. Romero therefore requests this court order the  
16 items returned their owners.

17 The government is aware of this request and has no objection.

18 DATED: October 10, 2024  
19

20 /s/ Kresta Daly

21 Kresta Daly  
22 Attorney at Law  
23  
24  
25  
26  
27  
28

**ORDER**

Good cause appearing the following items are released and ordered returned to their owners:

Title to 2014 Chevrolet Corvette Stingray from Edward Romero [Dkt. 236];  
Title to 1995 Bay Linder Boat and 1995 boat trailer from Jairo Romero [Dkt. 237];

Title to 2001 Chevrolet Tahoe from Erika Romero [Dkt. 238];

Title to 2013 Chevrolet Malibu from Erika Romero [Dkt. 239];

Title to 2015 Hyundai Sonata from Carla Olivera [Dkt. 240];

Title to 2017 Nissan from Olivera Ramirez Aroldo [Dkt. 241];

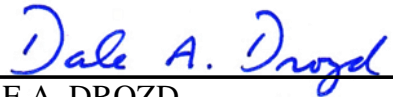
\$35,000 cash [no docket number, docketed between entries 241 and 242];

and

Title to 2013 Dodge Charger from Edward Erubiel Romero [Dkt. 242].

IT IS SO ORDERED.

Dated: **October 11, 2024**

  
\_\_\_\_\_  
DALE A. DROZD  
UNITED STATES DISTRICT JUDGE

BARTH DALY LLP  
ATTORNEYS AT LAW  
DAVIS, CALIFORNIA

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28